

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

KATHRYN KNOWLTON, et al.,

Plaintiffs,

v.

Case No. 2020-CV-01660

CITY OF WAUWATOSA, et al.,

Defendants.

DEFENDANTS' MOTION TO SEAL

Defendants, by their attorneys, Wirth + Baynard, hereby move the Court pursuant to Fed. L.R. 79(d), for an order sealing the following documents:

1. Roy Declaration Exhibits A and B: Documents and videos within the January 7, 2021, Open Records Dropbox folder.
2. Ratkowski Declaration Exhibit A: Versions of the Protestor List.

Defendants request that the above-referenced documents be viewable only by the Court and the attorneys of record who have appeared in this matter. In support of the request, Defendants state as follows:

1. The parties, through counsel, jointly stipulated to a Protective Order on October 7, 2022. (ECF No. 233) The Court approved the Stipulated Protective Order via an Order on October 31, 2022. *Id.*
2. The Protective Order prevents the parties from disclosing the Dropbox folder to the public. *Id.* at ¶ 1.
3. The Protective Order prevents the parties from disclosing the unredacted Protestor List to the public. *Id.* at ¶¶ 2-4.

4. Therefore, the Defendants respectfully request that the above-referenced document be filed under seal and only viewable only by the Court and the attorneys of record who have appeared in this matter.

Dated at Wauwatosa, Wisconsin this 19th day of December 2022.

WIRTH + BAYNARD
Attorneys for Defendants

/s/ Kiley B. Zellner
Kiley B. Zellner, WI Bar No. 1056806
9898 W. Bluemound Road, Suite 2
Wauwatosa, Wisconsin 53226
T: 414) 291-7979 / F: (414) 291-7960
Email: kbz@wbattys.com